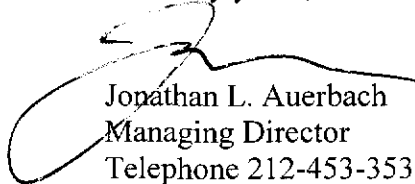


Should proposed Rule 15a-6(a)(3)(iii)(A)(1)(ii) and (2)(i) require that the records maintained by the foreign broker-dealer be in the English language or would maintenance in the language of the foreign broker-dealer's home country suffice? Under proposed Rule 15a-6(a)(3)(iii)(A)(1)(ii) what constitutes a "reasonable determination" that the foreign broker-dealer will furnish promptly to the Commission the requested books and records? Would a provision to that effect in the agreement between the SEC registered broker-dealer and the foreign broker-dealer suffice? Proposed Rule 15a-6(a)(3)(iii)(A)(2)(C) requires the SEC registered broker-dealer to obtain a representation from the foreign broker-dealer as to compliance with (a)(3)(i)(B) and (c). This would call for a similar treatment in this section.

We appreciate the opportunity to submit these comments and would be glad to consult with the staff as to any questions they may have.

Sincerely yours,



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